
DECLARATION OF ROBIN R. REHBORG

Pursuant to 28 U.S.C. § 1746, I, Robin R. Rehborg, states as follows:

1. I am over 18 years of age, have personal knowledge of the matters set forth herein, and am competent to make this Declaration.

2. My name is Robin R. Rehborg. I serve as the Deputy Director for Driver Safety of the North Dakota Department of Transportation (NDDOT). I have served with the NDDOT for approximately 18 years. In my capacity as Deputy Director of the NDDOT, I am familiar with the State of North Dakota's processes and costs for issuing Driver Licenses and Identification Cards.

3. At the request of the North Dakota Attorney General's Office, NDDOT has analyzed the approximate net costs incurred by the State for each Driver License or Identification Card that is issued by the State. Based on data from the 2021-23 biennium, NDDOT has calculated that the State incurs aggregate costs of approximately \$18.97 for each Driver License or Identification Card that is issued by the State. That aggregate cost includes material costs and as well as staff hours for receiving and reviewing the required documentation for each applicant, creating and distributing the physical card, and updating and maintaining required databases.

4. That aggregate cost of \$18.97 relates only to the processing, creation, and maintenance of the Driver License or Identification Card credential; it does not include costs related to administering the written or road test portions of a Driver License. As of the time of this declaration, NDDOT is still reviewing data from the 2021-23 biennium to calculate the average cost for testing associated with each Driver License applicant.

5. The State of North Dakota receives a \$15 fee from each applicant for a Driver

License and an \$8 fee for each applicant for an Identification Card (for a Driver License, there are separate \$5 fees each for the written test and the road test). The aggregate cost to the State of producing each sort of credential is the same. As such, during the 2021-23 biennium, NDDOT produced each Driver License at a net cost to the State of approximately \$3.97 per credential and each Identification Card at a net cost to the State of approximately \$10.97 per credential. NDDOT has no reason to believe that net costs during the 2023-25 biennium are, or will be, substantially different. As noted in the preceding paragraph, that net cost does not account for costs associated with Driver License testing (nor the \$5 fees associated with that testing).

6. Driver Licenses and Identification Cards issued by the State of North Dakota to non-citizens must be distinguishable from Driver Licenses and Identification Cards issued to U.S. citizens. *See* N.D.C.C. § 39-06-07.1. Currently, the State of North Dakota has 12,879 active Driver Licenses and Identification Cards issued to non-citizens of the United States; 10,766 of those non-citizen credentials are Driver Licenses and 2,113 are Identification Cards.

7. NDDOT is currently only capable of reporting the average costs for creating Driver License and Identification Card credentials on an aggregate basis and is unable to offer a specific number for the difference in average costs associated with citizen and non-citizen credentials. However, NDDOT believes to the extent there is a difference in average costs per applicant, non-citizen applicants will be slightly higher than the average due to additional staff time required to confirm eligibility and verify documents.

8. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in Bismarck, North Dakota, on October 25, 2024.

A handwritten signature in black ink, appearing to read "R. R. Rehborg", is written over a horizontal line.

Robin R. Rehborg
Deputy Director for Driver Safety
N.D. Department of Transportation